

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

COMPLAINT UNDER CIVIL RIGHTS ACT 42 U.S.C. § 1983



Action Number

(To be supplied by the Clerk, U.S. District Court)

Please fill out this complaint form completely. The Court needs the information requested in order to assure that your complaint is processed as quickly as possible and that all your claims are addressed. Please print/write legibly or type.

I. PARTIES

A. Plaintiff:

1. (a) Rabbi: JAMES H. RAYMOND (Name) (b) # 1007103 (Inmate number)
(c) L.V.C.C. 1607 PLANTERS ROAD (Address)
LAWRENCEVILLE VA. 23868

Plaintiff MUST keep the Clerk of Court notified of any change of address due to transfer or release. If plaintiff fails to keep the Clerk informed of such changes, this action may be dismissed.

Plaintiff is advised that only persons acting under the color of state law are proper defendants under Section 1983. The Commonwealth of Virginia is immune under the Eleventh Amendment. Private parties such as attorneys and other inmates may not be sued under Section 1983. In addition, liability under Section 1983 requires personal action by the defendant that caused you harm. Normally, the Director of the Department of Corrections, wardens, and sheriffs are not liable under Section 1983 when a claim against them rests solely on the fact that they supervise persons who may have violated your rights. In addition, prisons, jails, and departments within an institution are not persons under Section 1983.

B. Defendant(s):

1. (a) GEO GROUP INC. (Name) (b) PRIVATE FOR HIRE CORPORATION: AT L.V.C.C. (Title/Job Description) For V.A.D.O.C.
(c) 621 N.W. 53RD SUITE 700 (Address)

Boca RATON, Florida 33487



(B). DEFENDANT(S).

(4). (A). D.D. HICKS
(NAME)

(B). C.H.A.P. AT L.V.C.C./for GEO GROUP INC
(JOB TITLE)

(C). L.V.C.C. 1607 PLANTERS ROAD
LAWRENCEVILLE, VA 23868
(Address)

(5). (A). Ms. Bullock
(NAME)

(B). A.D.A. COORDINATOR/for GEO GROUP INC
(JOB TITLE)

(C). L.V.C.C. 1607 PLANTERS ROAD
LAWRENCEVILLE, VA. 23868
(Address)

(A)
(6). Dr. ESCHAGHI
(NAME)

(B). DOCTOR AT L.V.C.C./for GEO GROUP INC.
(JOB TITLE)

(C). LVCC 1607 PLANTERS ROAD
LAWRENCEVILLE, VA. 23868
(Address)

(address)

2. (a) HAROLD W. CLARKE (b) DIRECTOR OF VA. D.O.C.

(name) (title/job
description)

(c) P.O. Box 26963
(address)

Richmond VA. 23261

3. (a) MARK AMONETTE, MD. (b) CHIEF PHYSICIAN AT VA D.O.C.

(name) (title/job
description)

(c) P.O. Box 26963
(address)

Richmond, VA. 23261

If there are additional defendants, please list them on a separate sheet of paper. Provide all identifying information for each defendant named.

Plaintiff MUST provide an address for defendant(s) in order for the court to serve the complaint. If plaintiff does not provide an address for a defendant, that person may be dismissed as a party this action.

In addition, plaintiff MUST provide a copy of the completed complaint and any attachments for EACH defendant named.

II. PREVIOUS LAWSUITS

A. Have you ever begun other lawsuits in any state or federal court relating to your imprisonment? Yes ☒ No ☐

B. If your answer to A is YES: You must describe any lawsuit, whether currently pending or closed, in the space below. [If there is more than one lawsuit, you must describe each lawsuit on another sheet of paper, using the same outline, and attach hereto.]

1. Parties to previous lawsuit: THERE WAS TWO LAWSUITS:

Plaintiff(s) RABBI: JAMES H. RAYNOR WAS PLAINTIFF ON BOTH LAWSUITS:

Defendant (s) LAW SUIT # (1). PUGH, ET AL., HAROLD W. CLARKE:
LAW SUIT # (2). HAROLD W. CLARKE, GEO GROUP INC, ET AL.

2. Court [if federal court, name the district, if state court, name the county]: U.S. DISTRICT COURT FOR THE EASTERN DISTRICT OF VA. ALEXANDRIA DIVISION:

3. Date lawsuit filed: LAW SUIT # (1):
AROUND MAY/JUNE-2013
LAW SUIT # (2), 2018

4. Docket number: LAW SUIT # (1). 1-13-CV-01117-LMB-JFA.
LAW SUIT # (2), 1-19-CV-1392

5. Name of Judge to whom case was assigned: LAW SUIT # (1). U.S. DISTRICT JUDGE LEONIE M. BRINKMAN; LAW SUIT # (2). U.S. DISTRICT COURT JUDGE
"LEONIE M. BRINKMAN," AND "U.S. DISTRICT MAGISTRATE JUDGE, MICHAEL S. NACHMANOFF"

6. Disposition [Was case dismissed? Appealed? Is it still pending? What relief was granted, if any?]: BOTH CASES

WAS SETTLED:

III. GRIEVANCE PROCEDURE

A. At what institution did the events concerning your current complaint take place? LAWRENCEVILLE, C.C.

B. Does the institution listed in A have a grievance procedure?
Yes ☒ No ☐

C. If your answer to B is YES:

1. Did you file a grievance based on this complaint?
Yes ☒ No ☐

2. If so, where and when: FROM MARCH-2020
UNTIL MAY-2021

3. What was the result? NOTHING HAS EVER BEEN
DONE ON ANY ISSUES

4. Did you appeal? Yes ☒ No ☐

5. Result of appeal: Nothing at all every issue

was ignored, and still is being ignored

D. If there was no prison grievance procedure in the institution, did you complain to the prison authorities.
Yes ☐ No ☐

C. If your answer is YES: What steps did you take?

E. If your answer is NO, explain why you did not submit your complaint to the prison authorities.

VI. STATEMENT OF THE CLAIM

[State here as briefly as possible the facts of your case. Describe how each defendant is involved and how you were harmed by their actions. Also include the names of any other persons involved, dated and places of events. You may cite constitutional amendments you allege were violated, but do not give any legal arguments or cite any cases or statutes.]

If you intend to allege several related claims, number and set forth each claim in a separate paragraph. (Attach additional sheets if necessary.)

VIOLATIONS OF THE UNITED STATES CONSTITUTIONAL LAWS UNDER THE 8TH AMENDMENT'S AND THE 14TH AMENDMENT'S; UNDER THE DELIBERATE INDIFFERENCE TO MY SERIOUS MEDICAL NEEDS THAT AT ALL TIMES HAS CAUSED EXTREM DEBILITATING PAIN AND SUFFERING; AND EXTREM LIFE ENDANGERMENT; VIOLATIONS OF BOTH STATE AND FEDERAL LAWS UNDER THE AMERICANS WITH DISABILITIES ACT; THE FIRST AMENDMENT ACT, UNDER THREAT, INTENTATION, AND RETALIATION; DEFENDANTS COMMITTED CRIMINAL CONTEMPT OF BOTH SETTLEMENT AGREEMENT CONTRACT'S PRE-EXISTING DUTY THAT IS LEGALLY AND LAWFULLY BOUND TO PERFORM; A LEGAL DUTY ARISING BY A CONTRACT OPERATING UNDER THE LAW OF OBLIGATION THAT THE BREACH OF WHICH WOULD NOT ONLY BE LAWFULLY WRONG, BUT THE INTENT TO COMMIT FRAUD, AND THREAT IS A CRIMINAL INTENT; THE LEGAL OBLIGATIONS AND CONDITIONS OF THE TWO SETTLEMENT AGREEMENT CONTRACTS ARE UNDER LAWFUL NOTARY SEAL, AND THE LAWFUL CONTRACT BOND IS AN INDEMNITY AGREEMENT TO PROTECT AGAINST LOSS DUE TO BREACH OF CONTRACT, WHERE THE PERFORMANCE BOND UNDER A FORMAL SETTLEMENT AGREEMENT CONTRACT CONDITIONS FALLS UPON DEFAULT JUDGMENT UNDER THE FEDERAL COURT SEAL FOR THE DEFENDANTS FAILURE TO ACT, OR NEGLECT FAILURE TO MEET THE LAWFULL CONDITIONS AND OBLIGATIONS OF THE LAW TO PERFORM THE ACTION ACTS OF OBLIGATIONS LEGALLY REQUIRED OF THE DEFENDANTS, TO PLAINTIFF THAT HE IS LEGALLY ENTITLED TO OBTAIN

PLAINTIFF WILL SHOW THIS COURT NOT ONLY CRIMINAL CONTEMPT BUT ALSO SHOW BEYOND ANY REASONABLE DOUBT THAT DEFENDANTS ARE CRIMINAL NEGLIGENT. AND WILLFULLY COMMITTS CRIMINAL FRAUDULANT CONVERSION TO COMMIT BY FRAUD TO WITH HOLD MEDICAL TREATMENTS, OR MEDICAL A.D.A. MEDICAL EQUIPMENT AND OUTSIDE TREATMENT FOR MONEY REASONS: PLAINTIFF WILL SHOW THIS COURT THE LIFE ENDANGERMENT THAT GEO GROUP INC IMPOSES ON HIM AS WELL AS OTHER INMATES: PLAINTIFF WILL SHOW THIS COURT THE DEFENDANTS AT GEO GROUP INC ALSO VIOLATES IT'S ~~LA~~ LEGAL CONTRACT WITH ~~VA~~ VA.D.O.C. AND THAT VA.D.O.C. DIRECTOR MR. HAROLD W. CLARKE HAS LEGAL COMMON KNOWLEDGE OF GEO GROUP INC'S BREACHES OF THEIR CONTRACT AND STILL REFUSES TO TERMINATE THEIR CONTRACT: CAUSING LEGAL CONFLICT AND CONDITIONS OF CONFINEMENT AT L.V.C.C. EXTREMELY DANGEROUS NOT ONLY TO PLAINTIFF BUT EVERY INMATE AT L.V.C.C. PLAINTIFF UNDER HIS 14TH AMENDMENT UNDER HIS DISCOVERY FILE A LAWFUL (SUBPOENA DUCES TECUM) FOR WITNESSES UNDER PENALTY OF PERJURY + PUNISHMENT OF THE FEDERAL LAW TO BRING FOURTH SPECIFIED LEGAL DOCUMENTS TO APPEAR BEFORE THIS COURT: SHOWING CRIMINAL DEPRIVATION UNDER COLOR OF BOTH STATE AND FEDERAL LAWS: PLAINTIFF WILL SHOW THIS COURT THAT GEO GROUP INC STAFF NOT ONLY VIOLATED CONFIDENTIALITY OF CLAUSE OF THEIR FEDERAL SETTLEMENT AGREEMENT CONTRACT AS STATED ON PAGE (4) LINE (8). WHICH DEFAULTS THE LEGAL CONTRACT BUT ALSO IS LEGALLY LIABLE ~~AND~~ UNDER THE LAW FOR LEGAL DAMAGES: AND IS LEGALLY ENFORCEABLE JUST AS IF IT WAS PLAINTIFF WHO VIOLATED THE LEGAL CONFIDENTIALITY CLAUSE: AND CONDITION'S OF THE TWO SETTLEMENT AGREEMENT CONTRACTS:

V. RELIEF

I understand that in a section 1983 action the Court cannot change my sentence, release me from custody or restore good time. I understand should file a petition for a writ of habeas corpus if I desire this type of relief. R.J.H.R. [please initial]

The plaintiff wants the Court to: [check those remedies you seek]

- ☒ award money damages in the amount of \$ TEN MILLION DOLLARS
- ☒ grant injunctive relief by TO GET ALL HIS MEDICAL NEEDS MET, AND HIS PAIN MEDICATION FOR HIS SPINE INJURY AND HIS EXTREM DEBILITATING MIGRAINES
- ☒ Other HIS FIRST AMENDMENT RIGHT FOR HIS ORTHODOX JEWISH KOSHER MEALS AT LAWRENCEVILLE, C.C. DUE TO LAWFUL CONDITIONS OF HIS SETTLEMENT AGREEMENT CONTRACT # (1), PAGE'S 17 (1), (2), LINE'S 17 (1), WHERE HE CAN REMAIN AND GET HIS RELIGIOUS RIGHTS HONORED: BY HIS S.A. CONTRACT'S LAWFUL CONDITIONAL RULE TO STAY AT L.V.C.C.

VI. PLACES OF INCARCERATION

Please list the institutions at which you were incarcerated during the last six months. If you were transferred during this period, list the date(s) of transfer. Provide an address for each institution.

LAWRENCEVILLE CORRECTIONAL CENTER, AT LAWRENCEVILLE VA

1607 PLANTERS ROAD:

VII. CONSENT

CONSENT TO TRIAL BY A MAGISTRATE JUDGE: The parties are advised of their right, pursuant to 28 U.S.C. § 636 (c), to have a U.S. Magistrate Judge preside over a trial, with appeal to the U.S. Court of Appeals for the Fourth Circuit.

Do you consent to proceed before a U.S. Magistrate Judge:
Yes ☒ No ☐. You may consent at any time; however, any early consent is encouraged.

VIII. SIGNATURE

If there is more than one plaintiff, each plaintiff must sign for himself or herself.

Signed this 16th day of MAY, 2021

Plaintiff Relit: James H. Raynor